

EXHIBIT A

From: Lanning, William [WLANNING@ftc.gov]
Sent: Tuesday, August 07, 2018 10:04 AM
To: Pruden, Gregory
Subject: CDK FTC File No. 171-0056

Dear Greg,

Dana advised me that you need information concerning our handling of the latest CDK claims that documents were inadvertently produced to the FTC in the above-titled investigation.

In my letter of April 20, 2018, I set forth the procedure for the handling of CDK's claims of inadvertent disclosure. We have applied the same procedure to each claim made since April 20, 2018 pursuant to the FTC Rule governing the handling of such claims.

In addition, we need to discuss the issues concerning the completion of the privilege log. Please advise me of a time next week when we can schedule a call.

Thanks,

Bill

EXHIBIT B

	<u>Bates Beg Authenticom</u>	<u>Bates Beg CDK CID</u>
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391	CDK-1188470	CDK_CID_00934993
392	CDK-1188476	CDK_CID_00934999

	<u>Bates Beg Authenticom</u>	<u>Bates Beg CDK CID</u>
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394	CDK-1189620	CDK_CID_00936150
395	CDK-1192903	CDK_CID_00939433
396	CDK-1192906	CDK_CID_00939436
397	CDK-1192909	CDK_CID_00939439
398	CDK-1192912	CDK_CID_00939442
399	CDK-1192919	CDK_CID_00939451
400	CDK-2441428	CDK_CID_02217539
401	CDK-2441429	CDK_CID_02217540
402	CDK-2441439	CDK_CID_02217550
403	CDK-1192846	CDK_CID_00939376
404	CDK-1195565	CDK_CID_00942097
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406	CDK-2441484	CDK_CID_02217595
407	CDK-2441485	CDK_CID_02217596
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413	CDK-2441492	CDK_CID_02217603
414	CDK-2441493	CDK_CID_02217604
415	CDK-1038861	CDK_CID_00784771
416	CDK-1042475	CDK_CID_00788393
417	CDK-1042476	CDK_CID_00788394
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422	CDK-1054329	CDK_CID_00800282
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424	CDK-2179568	CDK_CID_01730983
425	CDK-2179569	CDK_CID_01730984
426	CDK-1207113	CDK_CID_00953657
427	CDK-1207115	CDK_CID_00953659
428	CDK-2182111	CDK_CID_01734039
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431	CDK-2417209	CDK_CID_01742791
432	CDK-2417213	CDK_CID_01742795
433	CDK-2185599	CDK_CID_01744047
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435	CDK-0228255	CDK_CID_00247507
436	CDK-2440870	CDK_CID_02216931
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440	CDK-2440878	CDK_CID_02216939
441	CDK-2417370	CDK_CID_01752037

	<u>Bates Beg Authenticom</u>	<u>Bates Beg CDK CID</u>
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443	CDK-2417387	CDK_CID_01752054
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446	CDK-2417427	CDK_CID_01756179
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448	CDK-2441880	CDK_CID_02218167
449	CDK-2417899	CDK_CID_01757845
450	CDK-2417968	CDK_CID_01757926
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453	CDK-2417974	CDK_CID_01758004
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455	CDK-2417445	CDK_CID_01756705
456	CDK-1789011	CDK_CID_01756735
457	CDK-2196713	CDK_CID_01756763
458	CDK-2196717	CDK_CID_01756767
459	CDK-2196721	CDK_CID_01756771
460	CDK-2196766	CDK_CID_01756837
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469	CDK-1788992	CDK_CID_01756610
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	<u>Bates Beg Authenticom</u>	<u>Bates Beg CDK CID</u>
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492	CDK-2418350	CDK_CID_01761792
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495	CDK-2046398	CDK_CID_02215613
496	CDK-2439722	CDK_CID_02215615
497	CDK-2439723	CDK_CID_02215616
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502	CDK-2441079	CDK_CID_02217142
503	CDK-2441080	CDK_CID_02217143
504	CDK-2418354	CDK_CID_01762534
505	CDK-2418355	CDK_CID_01762535
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522	CDK-2441911	CDK_CID_02218198
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	Bates Beg Authenticom	Bates Beg CDK CID
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546	CDK-2441957	CDK_CID_02218248
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593	CDK-0252595	CDK_CID_00271974
594	CDK-0253675	CDK_CID_00273054
595	CDK-0255563	CDK_CID_00274942
596	CDK-0255624	CDK_CID_00275003
597	CDK-2214483	CDK_CID_01780276
598	CDK-2418860	CDK_CID_01780403
599	CDK-2418861	CDK_CID_01780404
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603	CDK-2416587	CDK_CID_01683438
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609	CDK-0979780	CDK_CID_00724617
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625	CDK-2416891	CDK_CID_01693599
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634	CDK-2438946	CDK_CID_02210422
635	CDK-2438948	CDK_CID_02210424
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647	CDK-2440821	CDK_CID_02216882
648	CDK-2440823	CDK_CID_02216884
649	CDK-2440827	CDK_CID_02216888
650	CDK-2440829	CDK_CID_02216890
651	CDK-0984875	CDK_CID_00729899
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654	CDK-0984949	CDK_CID_00729975
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672	CDK-2440834	CDK_CID_02216895
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676	CDK-2440860	CDK_CID_02216921
677	CDK-2440861	CDK_CID_02216922
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679	CDK-2440843	CDK_CID_02216904
680	CDK-2440844	CDK_CID_02216905
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683	CDK-2438542	CDK_CID_02166011
684	CDK-1075074	CDK_CID_00821110
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	Bates Beg Authenticom	Bates Beg CDK CID
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699	CDK-1091392	CDK_CID_00837496
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	Bates Beg Authenticom	Bates Beg CDK CID
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746	CDK-0886854	CDK_CID_00458439
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2329	CDK-2415777	CDK_CID_01640637
2330	CDK-2415778	CDK_CID_01640638
2331	CDK-2415779	CDK_CID_01640639
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2395	CDK-2108360	CDK_CID_01612843
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August 22, 2018

By E-MAIL

Elizabeth McKenna
MILBERG TADLER PHILLIPS GROSSMAN LLP
One Pennsylvania Plaza
New York, NY 10119

Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Elizabeth:

I write regarding 28 documents identified in Exhibit 1 to Dealership Class Plaintiffs' Motion to Compel Disclosure of 1,807 Documents (Dkt. 308) filed on August 6, 2018. For your reference, these 28 documents are listed in Attachment A to this letter. We provided information about the production status and production history of these documents in letters to the Dealership Class Plaintiffs dated August 3 and 4, based on the information reasonably available to us at that time. We initially identified the 28 documents listed in Attachment A as "Category 2" documents (using the Category labels in our August 3 and 4 letters). Upon further investigation and review, however, we have determined the following:

- 16 of the documents identified in Attachment A actually are in Category 1. That is, they were withheld from production to the FTC in the *first* instance, and produced to the FTC as a slip-sheet. These documents are labeled "Category 1" in Attachment A.
- The remaining 12 documents identified in Attachment A—many of which were produced to the FTC in the first instance in redacted form—were not clawed back from the FTC. Accordingly, CDK will be producing an overlay for these 12 documents this evening, and we will advise the Court in our response brief that these documents are not at issue.

Sincerely,

/s/ Jessica A. Michaels
Jessica A. Michaels

cc: MDL Counsel of Record
Mark Ryan
Britt Miller
Andrew Marovitz
Matt Provance

In re Dealer Management Systems Antitrust Litigation, MDL 2817
 Case No. 18-CV-864 (N.D. Ill.)

	Bates Beg_Authenticom	Bates Beg_CDK_CID	Document Treatment
1	CDK-2414368	CDK_CID_01577340	CDK will produce a replacement image to MDL Plaintiffs
2	CDK-2417182	CDK_CID_01730315	CDK will produce a replacement image to MDL Plaintiffs
3	CDK-2420099	CDK_CID_01833080	Category 1
4	CDK-2420100	CDK_CID_01833081	Category 1
5	CDK-2420035	CDK_CID_01831811	CDK will produce a replacement image to MDL Plaintiffs
6	CDK-2420128	CDK_CID_01833197	Category 1
7	CDK-2420129	CDK_CID_01833198	Category 1
8	CDK-2420254	CDK_CID_01834625	Category 1
9	CDK-2420255	CDK_CID_01834626	Category 1
10	CDK-2420423	CDK_CID_01835554	Category 1
11	CDK-2420357	CDK_CID_01834936	Category 1
12	CDK-2420851	CDK_CID_01844080	Category 1
13	CDK-2421048	CDK_CID_01845491	Category 1
14	CDK-2421098	CDK_CID_01846891	Category 1
15	CDK-2421099	CDK_CID_01846892	Category 1
16	CDK-2421100	CDK_CID_01847072	CDK will produce a replacement image to MDL Plaintiffs
17	CDK-2421101	CDK_CID_01847073	Category 1
18	CDK-2421142	CDK_CID_01847603	CDK will produce a replacement image to MDL Plaintiffs
19	CDK-2421145	CDK_CID_01847743	CDK will produce a replacement image to MDL Plaintiffs
20	CDK-2421219	CDK_CID_01848508	CDK will produce a replacement image to MDL Plaintiffs
21	CDK-2421401	CDK_CID_01882552	CDK will produce a replacement image to MDL Plaintiffs
22	CDK-2421420	CDK_CID_01882571	CDK will produce a replacement image to MDL Plaintiffs
23	CDK-2421440	CDK_CID_01882591	CDK will produce a replacement image to MDL Plaintiffs
24	CDK-2421525	CDK_CID_01886506	CDK will produce a replacement image to MDL Plaintiffs
25	CDK-2414936	CDK_CID_01605290	CDK will produce a replacement image to MDL Plaintiffs
26	CDK-2414938	CDK_CID_01605292	Category 1
27	CDK-2414939	CDK_CID_01605293	Category 1
28	CDK-2422155	CDK_CID_01894481	Category 1